

Inspection Output (IOR)

Generated on 2022.May.17 15:35

Report Filters

Assets All, and including items not linked to any asset.

Results All

Inspection Information

Inspection Name	8434 - Klickitat PUD Standard	Operator(s)	KLICKITAT PUBLIC UTILITY DISTRICT (39809)	Plan Submitted	03/14/2022
Status	PLANNED	Lead	Scott Anderson	Plan Approval	03/17/2022 by Scott Rukke
Start Year	2022	Team Members	David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood, Darren Tinnerstet	All Activity Start	05/09/2022
System Type	GT	Observer(s)	Deborah Becker, Rell Koizumi	All Activity End	05/10/2022
Protocol Set ID	WA.GT.2021.02	Supervisor	Scott Rukke	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

This standard inspection consisted of a records and field review of Klickitat County PUD RNG pipeline. The Company operates approximately 12 miles of six inch natural gas transmission Pipeline in Klickitat County Washington beginning at the Williams Northwest Pipeline Interconnection at H.W. Hill Renewable Gas Project and ending at the intertie with Williams Pipeline approximately 6 miles to the northwest. The 6" steel FBE RNG pipeline runs at a MAOP of 824psig and is reinjected into the William NWP.

Facilities visited and Total AFOD

2 AFOD

Summary of Significant Findings

4 concerns

Primary Operator contacts and/or participants

Roy Rogers, Primary Consultant, Cathodic Protection Engineering

Alex Casimiro, Landfill Gas Operations Assistant, Klickitat PUD

Kevin Ricks, Renewable Energy Assets Manager, Klickitat PUD

Operator executive contact and mailing address for any official correspondence

Jim Smith

General Manager, Klickitat PUD

1313 S. Columbus Ave.

Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. KPUD	Klickitat PUD	unit	88970	Offshore GOM OCS Bottle/Pipe - Holders Gas Storage Field (Aboveground) Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric CDA Abandoned AMAOP Vault Service Line Plastic Pipe	190	190	190	190	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

Plan # Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent Notes
1. KPUD	WUTC Standard Inspection	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	R, O	Detail --

Plan Implementations

Activity # Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1. KPUD	--	05/09/2022 05/10/2022	WUTC Standard Inspection	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	KPUD	all types	190	190	190	190	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
2. Percent completion excludes unanswered questions planned as "always observe".

Forms

This inspection has no Form data entry.

Results (all values, 190 results)

208 (instead of 190) results are listed due to re-presentation of questions in more than one sub-group.

AR.PTI: Integrity Assessment Via Pressure Test

1. Question Result, ID, References NA, AR.PTI.PRESSTESTREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))

Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct or review pressure test assessment results are qualified for the tasks they perform?*

Assets Covered KPUD

Result Notes No IM plan, no HCAs

2. Question Result, ID, NA, AR.PTI.PRESSTESTRESULT.R, 192.517(a) (192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.517(b), 192.617, 192.619(a), 192.919(e), 192.921(a)(2))

Question Text *Do the test records validate the pressure test?*

Assets Covered KPUD

Result Notes No IMP, no HCA's

Reviewed Commissioning Hydrostatic Test Document

3. Question Result, ID, NA, AR.PTI.PRESSTESTCOMPLETE.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d))

Question Text *From field operations was the pressure test performed in accordance with Subpart J requirements and the process requirements?*

Assets Covered KPUD

Result Notes No such activity/condition was observed during the inspection.

AR.RMP: Repair Methods and Practices

4. Question Result, ID, NA, AR.RMP.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))

Question Text *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.*

Assets Covered KPUD

Result Notes No such activity/condition was observed during the inspection.

5. Question Result, ID, NA, AR.RMP.WELDTTEST.O, 192.719(a) (192.719(b))

Question Text *Does the operator properly test replacement pipe and repairs made by welding on transmission lines?*

Assets Covered KPUD

Result Notes No such activity/condition was observed during the inspection.

DC.COCMP: Compressor Station Construction

6. Question Result, ID, NA, DC.COCMP.CMPCOMBUSTIBLE.O, 192.735(a) (192.735(b), NFPA 30) (also presented in: FS.CS)

Question Text *Do field observations demonstrate that flammable/combustible materials are safely stored as required, and aboveground oil or gasoline storage tanks are installed at compressor stations according to 192.735(b)?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

7. Question Result, ID, NA, DC.COCMP.CMPGASDETECT.R, 192.303 (192.736(a), 192.736(b))

Question Text *Do records demonstrate that compressor buildings have a fixed gas detection and alarm system installed according to 192.736?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

8. Question Result, ID, NA, DC.COCMP.CMPGASDETECT.O, 192.303 (192.736(a), 192.736(b))

Question Text *Do field observations confirm that compressor buildings have a fixed gas detection and alarm system installed according to 192.736?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

DC.CO: Construction

9. Question Result, ID, References **NA, DC.CO.CASING.O, 192.323 (192.467(a), 192.467(b))**
Question Text *Do field observations confirm railroad or highway casings are being installed as designed and specified, and in accordance with 192.323?*
Assets Covered **KPUD**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
10. Question Result, ID, References **NA, DC.CO.REPAIR.R, 192.303 (192.309)**
Question Text *Do records demonstrate that repairs to steel pipe are being made in accordance with §192.309?*
Assets Covered **KPUD**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
11. Question Result, ID, References **NA, DC.DPC.CCROTTOATLOWER.R, 192.143(b) (192.461(c))** (also presented in: DC.DPC)
Question Text *Do records indicate that each pipe segment with external protective coating was inspected just prior to lowering into the ditch and backfilling, and any damage detrimental to effective corrosion control was repaired?*
Assets Covered **KPUD**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
- KPUD O&M section 4.3**

DC.WELDINS: Construction Weld Inspection

12. Question Result, ID, References **NA, DC.WELDINS.WELDVISUALQUAL.R, 192.241 (192.225, 192.227, 192.229, 192.231, 192.233, 192.243, 192.245)**
Question Text *Does the operator have records showing that the welding was visually and/or non-destructively tested according to the requirements of 192.241 and the operator's specifications or procedures?*
Assets Covered **KPUD**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
13. Question Result, ID, References **NA, DC.WELDINS.WELDNDT.R, 192.243**
Question Text *Do records indicate that NDT and interpretation are in accordance with 192.243?*
Assets Covered **KPUD**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
14. Question Result, ID, References **NA, DC.WELDINS.WELDREPAIR.R, 192.245 (192.303)**
Question Text *Do records indicate that unacceptable welds are removed and/or repaired in accordance with 192.245?*
Assets Covered **KPUD**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

DC.WELDPROCEDURE: Construction Welding Procedures

15. Question Result, ID, References **Sat, DC.WELDPROCEDURE.WELD.R, 192.225**
Question Text *Does the operator have detailed records showing proper qualification of the welding procedures in accordance with 192.225?*
Assets Covered **KPUD**
Result Notes **KPUD O&M section 11.5.2**
- Welding Procedure Specification AWS/CWI Chuck Nobles Cert. #16030351**
- No welding has been performed since the installation of the pipeline in 2018**

16. Question Result, ID, References **NA, DC.WELDPROCEDURE.WELDERQUAL.R, 192.227 (192.225, 192.229)**
 Question Text *Do the records demonstrate that the welders are qualified in accordance with applicable sections of API Standard 1104 or ASME BPVC, Section IX, and cover the limitations in 192.229?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
17. Question Result, ID, References **NA, DC.WELDPROCEDURE.WELDERQUAL.O, 192.227 (192.225, 192.229)**
 Question Text *Do field observations confirm that the welders are qualified in accordance with applicable sections of API Standard 1104 or ASME BPVC, Section IX, and cover the limitations in 192.229?*
 Assets Covered **KPUD**
 Result Notes **No such activity/condition was observed during the inspection.**

DC.DPCCMP: Design of Compressor Stations

18. Question Result, ID, References **NA, DC.DPCCMP.CMPBLDGLOCATE.R, 192.163 (192.143, GPTC, NFPA 70, 192.163(e))**
 Question Text *Do the operator's records indicate that the compressor station has been designed and constructed to comply with 192.163?*
 Assets Covered **KPUD**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
19. Question Result, ID, References **NA, DC.DPCCMP.CMPBLDGLOCATE.O, 192.163 (192.143, GPTC, NFPA 70)**
 Question Text *Do field observations confirm that design and construction of compressor station buildings meet the requirements of 192.163?*
 Assets Covered **KPUD**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
20. Question Result, ID, References **NA, DC.DPCCMP.CMPLIQPROT.O, 192.165 (192.143)**
 Question Text *Do field observations confirm that compressors are protected from liquids and, as applicable, liquid separators for compressors installed in accordance with 192.165?*
 Assets Covered **KPUD**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
21. Question Result, ID, References **NA, DC.DPCCMP.CMPESD.R, 192.167 (192.143)**
 Question Text *Do the operator's records indicate that compressor station emergency shutdown systems meet the requirements of 192.167?*
 Assets Covered **KPUD**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
22. Question Result, ID, References **NA, DC.DPCCMP.CMPESD.O, 192.167 (192.143)**
 Question Text *Do field observations confirm that design and construction of compressor station emergency shutdown systems meet the requirements of 192.167?*
 Assets Covered **KPUD**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
23. Question Result, ID, References **NA, DC.DPCCMP.CMPRESSLIMIT.R, 192.169 (192.141, 192.143, 192.199)**
 Question Text *Does the operator have records to indicate that compressor stations have pressure relief or other suitable protective devices in accordance with 192.169?*
 Assets Covered **KPUD**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
24. Question Result, ID, References **NA, DC.DPCCMP.CMPRESSLIMIT.O, 192.169 (192.141, 192.143, 192.199)**

Question Text *Do field observations confirm design and construction of compressor station pressure limiting devices meet the requirements of 192.169?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

25. Question Result, ID, References NA, DC.DPCCMP.CMPSAFETYEQIP.R, 192.171 (192.143)

Question Text *Do the operator's records indicate that additional compressor station safety equipment is designed and constructed in accordance with 192.171?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

26. Question Result, ID, References NA, DC.DPCCMP.CMPSAFETYEQIP.O, 192.171 (192.141, 192.143)

Question Text *Do field observations confirm that design and construction of additional compressor station safety equipment meet the requirements of 192.171?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

27. Question Result, ID, References NA, DC.DPCCMP.CMPVENTILATE.R, 192.173 (192.143)

Question Text *Do operator records indicate that the design and construction of compressor buildings meet the ventilation requirements of 192.173?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

28. Question Result, ID, References NA, DC.DPCCMP.CMPVENTILATE.O, 192.173 (192.143)

Question Text *Do field observations confirm that design and construction of compressor buildings meet the ventilation requirements of 192.173?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

DC.DPCOPP: Design of Pipe - Overpressure Protection

29. Question Result, ID, References NA, DC.DPCOPP.OVERPRESSURE.R, 192.195(a) (192.199(a), 192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h), 192.201(a), 192.201(b), 192.201(c))

Question Text *Do records indicate that the pipeline has pressure relieving or pressure limiting devices that are required by 192.195(a), and that they meet the requirements of 192.199 and 192.201?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

There is no overpressure protection on the pipeline, KPUD delivers above the Williams MAOP

30. Question Result, ID, References NA, DC.DPCOPP.OVERPRESSURE.O, 192.195(a) (192.199(a), 192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h), 192.201(a), 192.201(b), 192.201(c))

Question Text *Are required pressure relieving or pressure limiting devices being installed, and do they meet the requirements of 192.199 and 192.201?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

31. Question Result, ID, References NA, DC.DPCOPP.PRESSLIMIT.R, 192.199(a) (192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h))

Question Text *Do records indicate that pressure relieving or pressure limiting devices meet the requirements of 192.199?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

32. Question Result, ID, References NA, DC.DPCOPP.PRESSLIMIT.O, 192.199(a) (192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h))

Question Text *Do field observations confirm pressure relieving or pressure limiting devices meet the requirements of 192.199?*

Assets Covered KPUD

Result Notes No such activity/condition was observed during the inspection.

33. Question Result, ID, References NA, DC.DPCOPP.PRESSLIMITCAP.R, 192.201(a) (192.201(b), 192.201(c))

Question Text *Do records indicate that pressure relief or pressure limiting stations being installed comply with 192.201?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

34. Question Result, ID, References NA, DC.DPCOPP.PRESSLIMITCAP.O, 192.201(a) (192.201(b), 192.201(c))

Question Text *Do field observations verify pressure relief or pressure limiting stations comply with the requirements of 192.201?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

35. Question Result, ID, References NA, DC.DPCOPP.MULTISTAGE.R,

Question Text *Do records indicate that the operator is installing multistage regulator equipment consistent with the requirements in WAC 480-93-130?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

KPUD O&M 11.2.5

DC.DPC: Design of Pipe Components

36. Question Result, ID, References Sat, DC.DPC.ILIPASS.R, 192.150 (192.150(a), 192.150(c))

Question Text *Do records indicate that certain transmission pipeline components are designed and constructed to accommodate the passage of instrumented internal inspection devices?*

Assets Covered KPUD

Result Notes KPUD pipeline has ILI capability

KPUD O&M section 11.2.3

No ILI has been done since the install of the pipeline

37. Question Result, ID, References Sat, DC.DPC.VALVESPACE.R, 192.179(a) (192.179(a)(1), 192.179(a)(2), 192.179(a)(3), 192.179(a)(4), 192.179(b), 192.179(c), 192.179(d))

Question Text *Do records indicate that transmission line valve spacing is in accordance with 192.179(a)?*

Assets Covered KPUD

Result Notes KPUD O&M section 11.2.4
2.79 mile separation between mainline valves at each end

i.e., Spacing is between class location III @4 Miles and class location IV @ 2.5 miles

38. Question Result, ID, References Sat, DC.DPC.VALVESPACE.O, 192.141 (192.179(a), 192.179(b), 192.179(c), 192.179(d))

Question Text *Are transmission line valves being installed as required by 192.179?*

Assets Covered KPUD

39. Question Result, ID, References Sat, DC.DPC.INTCORRODE.R, 192.476(d) (192.476(b), 192.476(c), 192.476(a))

Question Text *Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?*

Assets Covered KPUD

Result Notes No IC, KPUD O&M section 4.7

40. Question Result, ID, References **NA, DC.DPC.INTCORRODE.O, 192.476(a) (192.476(b), 192.476(c))**
 Question Text *Does the transmission project's design and construction comply with 192.476?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
41. Question Result, ID, References **NA, DC.DPC.CCPROTCOATLOWER.R, 192.143(b) (192.461(c))** (also presented in: DC.CO)
 Question Text *Do records indicate that each pipe segment with external protective coating was inspected just prior to lowering into the ditch and backfilling, and any damage detrimental to effective corrosion control was repaired?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
- KPUD O&M section 4.3**
42. Question Result, ID, References **NA, DC.DPC.CCELECTRICALISOL.R, 192.467(c) (192.143(b))**
 Question Text *Do operator's records indicate that each pipeline was electrically isolated from metallic casings that are a part of the underground system?*
 Assets Covered **KPUD**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
43. Question Result, ID, References **NA, DC.DPC.CCELECTRICALISOL.O, 192.467(c) (192.143(b))**
 Question Text *Do field observations confirm that each pipeline was electrically isolated from metallic casings that are a part of the underground system?*
 Assets Covered **KPUD**
 Result Notes **No such activity/condition was observed during the inspection.**

DC.MO: Maintenance and Operations

44. Question Result, ID, References **NA, DC.MO.ICEXAMINE.R, 192.491(c) (192.475(a), 192.475(b), 192.475(c))**
 Question Text *Do records indicate examination of removed pipe for evidence of internal corrosion?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
45. Question Result, ID, References **NA, DC.MO.ICEXAMINE.O, 192.475(a) (192.475(b), 192.475(c))**
 Question Text *Is examination of removed pipe conducted to determine any evidence of internal corrosion?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
46. Question Result, ID, References **NA, DC.MO.MAOPLIMIT.O, 192.605(b)(5)**
 Question Text *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?*
 Assets Covered **KPUD**
 Result Notes **No such activity/condition was observed during the inspection.**
47. Question Result, ID, References **Sat, DC.MO.RECORDUPDATE.R,**
 Question Text *Do records indicate that records, maps, and drawings of gas facilities are updated not later than six months from completion of construction activity and made available to appropriate personnel?*
 Assets Covered **KPUD**
 Result Notes **KPUD pipeline was commissioned September 2018, as-builts were updated within 6 months.**

DC.PT: Pressure Testing

48. Question Result, ID, [NA, DC.PT.PRESSTEST.R, 192.503\(a\) \(192.503\(b\), 192.503\(c\), 192.503\(d\), 192.503\(e\)\)](#) (also presented References in: [DC.PTLOWPRESS](#))
 Question Text *Do records indicate that pressure testing is conducted in accordance with 192.503?*
 Assets Covered [KPUD](#)
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)
- [KPUD O&M section 11.5.7](#)
- [Pressure test records were reviewed from the initial hydrostatic test in 2018, no issues.](#)
49. Question Result, ID, [NA, DC.PT.PRESSTEST.O, 192.503\(a\) \(192.503\(b\), 192.503\(c\), 192.503\(d\), 192.503\(e\)\)](#) (also presented References in: [DC.PTLOWPRESS](#))
 Question Text *Is pressure testing conducted in accordance with 192.503?*
 Assets Covered [KPUD](#)
 Result Notes [No such activity/condition was observed during the inspection.](#)
50. Question Result, ID, [NA, DC.PT.PRESSTESTHIGHSTRESS.R, 192.505\(a\) \(192.143\(a\), 192.517\(a\), 192.505\(b\), 192.505\(c\), 192.505\(d\), 192.143\(b\), 192.143\(c\)\)](#)
 Question Text *Do records indicate that the sections of a pipeline operating at a hoop stress equal to or greater than 30% of SMYS were strength tested in accordance with the requirements of 192.505?*
 Assets Covered [KPUD](#)
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)
- [KPUD pipeline is at an MAOP of 824psig, 18.6% SMYS](#)
51. Question Result, ID, [NA, DC.PT.PRESSTESTHIGHSTRESS.O, 192.505\(a\) \(192.143\(a\), 192.505\(b\), 192.505\(c\), 192.505\(d\), 192.143\(b\), 192.143\(c\)\)](#)
 Question Text *Do field observations confirm that sections of a pipeline operating at a hoop stress equal to or greater than 30% of SMYS are strength tested in accordance with the requirements of 192.505?*
 Assets Covered [KPUD](#)
 Result Notes [No such activity/condition was observed during the inspection.](#)
52. Question Result, ID, [NA, DC.PT.PRESSTESTENVIRON.R, 192.515\(b\) \(192.629\(a\), 192.629\(b\)\)](#) (also presented in: References [DC.PTLOWPRESS](#))
 Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, the test medium disposal was conducted in a manner that minimized damage to the environment?*
 Assets Covered [KPUD](#)
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)
- [KPUD O&M section 11.5.7.5](#)
- [When the initial hydrotest was done, the medium was disposed correctly.](#)
53. Question Result, ID, [NA, DC.PT.PRESSTESTENVIRON.O, 192.515\(b\) \(192.629\(a\), 192.629\(b\)\)](#) (also presented in: References [DC.PTLOWPRESS](#))
 Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, the test medium was disposed of in an environmentally sound manner?*
 Assets Covered [KPUD](#)
 Result Notes [No such activity/condition was observed during the inspection.](#)
54. Question Result, ID, [NA, DC.PT.PRESSTESTSAFETY.R, 192.515\(a\) \(192.629\(a\), 192.629\(b\)\)](#) (also presented in: References [DC.PTLOWPRESS](#))
 Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, every reasonable precaution was taken to protect its employees and the general public throughout the testing?*
 Assets Covered [KPUD](#)
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)
- [KPUD O&M section 11.5.7.5](#)

55. Question Result, ID, **NA, DC.PT.PRESSTESTSAFETY.O, 192.515(a) (192.629(a), 192.629(b))** (also presented in: References **DC.PTLOWPRESS**)
 Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*
 Assets Covered **KPUD**
 Result Notes **No such activity/condition was observed during the inspection.**
56. Question Result, ID, References **Sat, DC.PT.PRESSTESTRECORD.R, 192.517(a) (192.517(b))** (also presented in: DC.PTLOWPRESS)
 Question Text *Do records indicate creation and retention of a record for each Subpart J test performed for the required duration?*
 Assets Covered **KPUD**
 Result Notes **Pressure test records were reviewed from the initial hydrostatic test in 2018, no issues.**
57. Question Result, ID, References **Sat, DC.PT.EQUIPMENTCALIBRATION.R,**
 Question Text *Do records indicate that pressure testing equipment is maintained and calibrated at appropriate intervals in accordance with the manufacturer’s recommendations?*
 Assets Covered **KPUD**
 Result Notes **Reviewed PSS (Pipeline supply and services), calibration documents from the initial installation of the pipeline in 2018, no issues.**

DC.PTLOWPRESS: Pressure Testing - Low Pressure

58. Question Result, ID, **NA, DC.PT.PRESSTEST.R, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e))** (also presented in: DC.PT)
 Question Text *Do records indicate that pressure testing is conducted in accordance with 192.503?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
- KPUD O&M section 11.5.7**
- Pressure test records were reviewed from the initial hydrostatic test in 2018, no issues.**
59. Question Result, ID, **NA, DC.PT.PRESSTEST.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e))** (also presented in: DC.PT)
 Question Text *Is pressure testing conducted in accordance with 192.503?*
 Assets Covered **KPUD**
 Result Notes **No such activity/condition was observed during the inspection.**
60. Question Result, ID, **NA, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R, 192.507 (192.505, 192.515, 192.517, ANSI/GPTC Z380.1-2018 Appendix G-192-9)**
 Question Text *Do records indicate that, as applicable to the project, sections of a pipeline operating at a hoop stress less than 30% of SMYS and at or above 100 psig were tested in accordance with the requirements of 192.507?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
- KPUD pipeline operates at 824psig, 18.6% SMYS**
61. Question Result, ID, **NA, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.O, 192.507 (192.505, 192.515, ANSI/GPTC Z380.1-2018 Appendix G-192-9)**
 Question Text *Do field observations confirm that sections of a pipeline operating at a hoop stress less than 30% of SMYS and at or above 100 psig are tested in accordance with the requirements of 192.507?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
62. Question Result, ID, References **NA, DC.PTLOWPRESS.PRESSTEST100PSIG.R, 192.509 (192.143, 192.517)**
 Question Text *Do records indicate that the sections of a pipeline operated below 100 psig were leak tested in accordance with the section requirements of 192.509 (except for service lines and plastic pipelines)?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

63. Question Result, ID, References NA, DC.PT.LOWPRESS.PRESSTEST100PSIG.O, 192.509 (192.143)

Question Text Do field observations confirm that sections of a pipeline operated below 100 psig are leak tested in accordance with the requirements of 192.509 (except for service lines and plastic pipelines)?

Assets Covered KPUD

Result Notes No such activity/condition was observed during the inspection.

64. Question Result, ID, References NA, DC.PT.PRESSTESTENVIRON.R, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.PT)

Question Text Do records indicate while conducting tests under Subpart J – Test Requirements, the test medium disposal was conducted in a manner that minimized damage to the environment?

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

KPUD O&M section 11.5.7.5

When the initial hydrotest was done, the medium was disposed correctly.

65. Question Result, ID, References NA, DC.PT.PRESSTESTENVIRON.O, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.PT)

Question Text Do field observations confirm while conducting tests under Subpart J – Test Requirements, the test medium was disposed of in an environmentally sound manner?

Assets Covered KPUD

Result Notes No such activity/condition was observed during the inspection.

66. Question Result, ID, References NA, DC.PT.PRESSTESTSAFETY.R, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT)

Question Text Do records indicate while conducting tests under Subpart J – Test Requirements, every reasonable precaution was taken to protect its employees and the general public throughout the testing?

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

KPUD O&M section 11.5.7.5

67. Question Result, ID, References NA, DC.PT.PRESSTESTSAFETY.O, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT)

Question Text Do field observations confirm while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?

Assets Covered KPUD

Result Notes No such activity/condition was observed during the inspection.

68. Question Result, ID, References Sat, DC.PT.PRESSTESTRECORD.R, 192.517(a) (192.517(b)) (also presented in: DC.PT)

Question Text Do records indicate creation and retention of a record for each Subpart J test performed for the required duration?

Assets Covered KPUD

Result Notes Pressure test records were reviewed from the initial hydrostatic test in 2018, no issues.

DC.TQ: Training and Qualification

69. Question Result, ID, References Sat, DC.TQ.ABNORMAL.R, 192.807(a) (192.803)

Question Text Do records show evaluation of qualified individuals for recognition and reaction to AOCs?

Assets Covered KPUD

Result Notes Reviewed KPUD qualified employees AOC recognition task list, all were cognizant of AOCs.

70. Question Result, ID, References **Sat, DC.TQ.RECORDS.R, 192.807(a)** (Operators OQ program manual)
Question Text *Are qualification records maintained for operator personnel?*
Assets Covered **KPUD**
Result Notes **KPUD uses Energy Worldnet for all OQ training, all employees are up to date.**

EP.ERG: Emergency Response

71. Question Result, ID, References **Sat, EP.ERG.REVIEW.R, 192.605(a)**
Question Text *Have annual reviews been conducted of the emergency plans and procedures as required, and any updates completed as appropriate?*
Assets Covered **KPUD**
Result Notes **KPUD O&M Section 1.7**

Reviewed revisions log in the emergency plans, 12/24/19, 4/1/2020, 4/1/2021, performed by Doug Senn. No changes were necessary. No issues.

72. Question Result, ID, References **Sat, EP.ERG.LOCATION.O, 192.615(b)(1)**
Question Text *Are supervisors provided the applicable portions of the emergency plan and procedures?*
Assets Covered **KPUD**
Result Notes **KPUD EPM is available to all KPUD staff at the facility.**

73. Question Result, ID, References **NA, EP.ERG.POSTEVTREVIEW.R, 192.605(a) (192.615(b)(1), 192.615(b)(3))**
Question Text *Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?*
Assets Covered **KPUD**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

KPUD EPM (emergency procedure manual) section 1.9

74. Question Result, ID, References **Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)** (also presented in: PD.PA)
Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*
Assets Covered **KPUD**
Result Notes **KPUD EPM section 6**

Reviewed First Responder Liaison Efforts form F-36 from 2019-2021

FS.CSSYSROT: Compressor Station System Protection

75. Question Result, ID, References **NA, FS.CSSYSROT.CMPFP.O, 192.171(a)**
Question Text *Do compressor stations have adequate fire protection facilities?*
Assets Covered **KPUD**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

76. Question Result, ID, References **NA, FS.CSSYSROT.CMPGASDET.O, 192.736(a) (192.736(b))**
Question Text *Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings?*
Assets Covered **KPUD**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

77. Question Result, ID, References **NA, FS.CSSYSROT.CMPGASENGMFL.O, 192.171(e)**

- Question Text *Are gas engines in compressor stations equipped with mufflers that prevent gas from being trapped in the muffler?*
- Assets Covered KPUD
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
78. Question Result, ID, References **NA, FS.CSSYSROT.CMPGASENGSD.O, 192.171(d)**
- Question Text *Are compressor station gas engines that operate with pressure gas injection equipped so that stoppage of the engine will result in the fuel being automatically shut off and the engine distribution manifold being vented?*
- Assets Covered KPUD
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
79. Question Result, ID, References **NA, FS.CSSYSROT.CMPLUBROT.O, 192.171(c)**
- Question Text *Do compressor units have shutdown or alarm devices that will operate in the event of inadequate heating or lubrication?*
- Assets Covered KPUD
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
80. Question Result, ID, References **NA, FS.CSSYSROT.CMPOVSPD.O, 192.171(b)**
- Question Text *Do compressor stations' prime movers other than electrical induction or synchronous motors have automatic shutdown devices that will prevent over-speed of the prime mover or the unit being driven?*
- Assets Covered KPUD
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
81. Question Result, ID, References **NA, FS.CSSYSROT.CMPRELIEF.O, 192.199 (192.731(a), 192.731(b), 192.731(c))**
- Question Text *Are pressure relief/limiting devices inside a compressor station designed, installed, and inspected properly?*
- Assets Covered KPUD
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
82. Question Result, ID, References **NA, FS.CSSYSROT.ESDDISTSD.O, 192.167(b)**
- Question Text *Does each compressor station that supplies gas directly to a distribution system (with no other adequate sources of gas available) have an emergency shutdown system that will not function at the wrong time or cause unintended outages?*
- Assets Covered KPUD
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
83. Question Result, ID, References **NA, FS.CSSYSROT.ESDELECSO.O, 192.167(a)(3)(i) (192.167(a)(3)(ii))**
- Question Text *Does each compressor station have an emergency shutdown system that is capable of shutting down electrical facilities (except emergency and equipment protection circuits) near gas headers and within compressor buildings?*
- Assets Covered KPUD
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
84. Question Result, ID, References **NA, FS.CSSYSROT.ESDGASBLK.O, 192.167(a)(1)**
- Question Text *Does each compressor station have an emergency shutdown system that is capable of blocking gas out of the station and blow down the station piping? NOTE: Not required for field compressor stations of 1,000 horsepower (746 kilowatts) or less.*
- Assets Covered KPUD
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
85. Question Result, ID, References **NA, FS.CSSYSROT.ESDGASDISCH.O, 192.167(a)(2)**
- Question Text *Does each compressor station have an emergency shutdown system that is capable of safely discharging blowdown gas from the blowdown piping at a location where the gas will not create a hazard?*
- Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

86. Question Result, ID, References NA, FS.CSSYSPROT.ESDGASSD.O, 192.167(a)(3)

Question Text *Does each compressor station have an emergency shutdown system that is capable of shutting down gas compressing equipment and gas fires in the vicinity of gas headers and compressor buildings?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

87. Question Result, ID, References NA, FS.CSSYSPROT.ESDLOCATION.O, 192.167(a)(4)

Question Text *Does each compressor station have an emergency shutdown system that is capable of being operated from at least two locations which are: 1) Outside the gas area of the station, 2) Near the exit gates, if the station is fenced, or near emergency exits, if not fenced, 3) And not more than 500 feet (153 meters) from the limits of the station?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

88. Question Result, ID, References NA, FS.CSSYSPROT.UNATTPLATCMPSD.O, 192.167(c)(1)

Question Text *Does each unattended platform compressor station located offshore or in inland navigable waters have an emergency shutdown system that will actuate automatically in the event of the following occurrences? 1) When gas pressure equals the MAOP plus 15 percent and, 2) When an uncontrolled fire occurs on the platform.*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

89. Question Result, ID, References NA, FS.CSSYSPROT.CMPRELIEF.R, 192.709(b) (192.709(c), 192.731(a), 192.731(b), 192.731(c))

Question Text *Do records document with adequate detail that all inspection and testing of compressor station pressure relief devices with the exception of rupture disks have occurred at the required interval?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

90. Question Result, ID, References NA, FS.CSSYSPROT.CMPESDTESTDEV.R, 192.709(c) (192.731(c))

Question Text *Do records document the inspection and testing of all compressor station emergency shutdown devices at the required frequency?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

91. Question Result, ID, References NA, FS.CSSYSPROT.CMPGASDETOM.R, 192.709(c) (192.736(c))

Question Text *Do records document that all compressor station gas detection and alarm systems are being maintained and tested as required?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

FS.CS: Compressor Stations

92. Question Result, ID, References NA, DC.COCMP.CMPCOMBUSTIBLE.O, 192.735(a) (192.735(b), NFPA 30) (also presented in: DC.COCMP)

Question Text *Do field observations demonstrate that flammable/combustible materials are safely stored as required, and aboveground oil or gasoline storage tanks are installed at compressor stations according to 192.735(b)?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

93. Question Result, ID, References NA, FS.CS.BLDGEXITS.O, 192.163(c)

Question Text *Does each main compressor building operating floor have at least two separated, easily accessed and unobstructed exits to a place of safety, main compressor building exits that have door latches that can be readily opened without a key, and main compressor building exit doors mounted to swing outward?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

94. Question Result, ID, References NA, FS.CS.CMPNFPA70.O, 192.163(e)

Question Text *Does the equipment and wiring within compressor stations conform to National Electric Code, ANSI/NFPA 70, including the required posting or ready access of the permit?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

95. Question Result, ID, References NA, FS.CS.FENCEGATES.O, 192.163(d)

Question Text *Do fenced areas around compressor stations have at least two gates that provide for easy escape to place of safety, and do gates located within 200 feet of any compressor plant open outward and able to be opened from the inside without a key when the station is occupied?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

96. Question Result, ID, References NA, FS.CS.CMPBLDGVENT.O, 192.173

Question Text *Are compressor station buildings ventilated to ensure employees are not endangered by accumulation of gas in enclosed areas?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

97. Question Result, ID, References NA, FS.CS.CMPERP.O, 192.605(a) (192.615(b))

Question Text *Are emergency response plans for selected compressor stations kept on site?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

FS.VA: Valves

98. Question Result, ID, References Sat, FS.VA.CMPVLVTEST.R, 192.709(c) (192.745(a), 192.745(b))

Question Text *Do records adequately document that compressor transmission line valves have been inspected and partially operated at the correct interval?*

Assets Covered KPUD

Result Notes KPUD O&M section 3.9, Form F-4

Reviewed Form F-4 from 2018-2020

99. Question Result, ID, References Sat, FS.VA.CMPVLVMAINT.O, 192.745(a) (192.745(b))

Question Text *Are transmission line valves maintained as required?*

Assets Covered KPUD

Result Notes Roy Rogers performed valve operation on valves HA-14551 and HA-14549, operation was adequate.

Roy's OQ expiration for valves operation is 8/11/2023

MO.GC: Conversion to Service

100. Question Result, ID, References NA, MO.GC.CONVERSION.R, 192.14(a) (192.14(b), 192.14(c))

Question Text *Do records indicate the process was followed for converting any pipelines into Part 192 service?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

MO.GOABNORMAL: Gas Pipeline Abnormal Operations

101. Question Result, ID, References **NA, MO.GOABNORMAL.ABNORMAL.R, 192.605(a) (192.605(c)(1))**
 Question Text *Did personnel respond to indications of abnormal operations as required by the process?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
102. Question Result, ID, References **NA, MO.GOABNORMAL.ABNORMALREVIEW.R, 192.605(a) (192.605(c)(4))**
 Question Text *Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation processes and corrective action taken where deficiencies are found?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

MO.GOCLASS: Gas Pipeline Class Location

103. Question Result, ID, References **NA, MO.GOCLASS.CLASSLOCATESTUDY.R, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))**
 Question Text *Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location?*
 Assets Covered **KPUD**
 Result Notes **There has been no change in population and no change in hoop stress since the installation of the pipeline**
104. Question Result, ID, References **NA, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c))** (also presented in: MO.GO)
 Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Reviewed the KPUD Continuing Surveillance Summary documentation for 2018-2021
105. Question Result, ID, References **NA, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c))** (also presented in: MO.GO)
 Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*
 Assets Covered **KPUD**
 Result Notes **No such activity/condition was observed during the inspection.**

MO.GOMAOP: Gas Pipeline MAOP

106. Question Result, ID, References **Sat, MO.GOMAOP.MAOPDETERMINE.R, 192.709(c) (192.619(a), 192.619(b), 192.619(f), 192.517)**
 Question Text *Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?*
 Assets Covered **KPUD**
 Result Notes **KPUD pipeline operates at a MAOP of 824psig, 18.6% SMYS.**

Reviewed Hydrostatic test documents for MAOP confirmation

MO.GM: Gas Pipeline Maintenance

107. Question Result, ID, References **Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c))** (also presented in: MO.GMOPP)
 Question Text *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*
 Assets Covered **KPUD**
 Result Notes **Reviewed KPUD form F-17 Pipeline Patrol Report, 2019-2021, no issues. No repairs have been done on the pipe since installation in 2018**

108. Question Result, ID, References **NA, MO.GM.IGNITION.R, 192.709 (192.751(a), 192.751(b), 192.751(c))**
 Question Text *Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

KPUD O&M section 6.1
109. Question Result, ID, References **Sat, MO.GM.VALVEINSPECT.R, 192.709(c) (192.745(a), 192.745(b))**
 Question Text *Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary?*
 Assets Covered **KPUD**
 Result Notes **Reviewed KPUD Form F-4 Valve inspection, 2019-2021, all inspections were done within the required time interval. No issues.**

KPUD O&M section 3.9
110. Question Result, ID, References **Sat, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b))**
 Question Text *Are field inspection and partial operation of transmission line valves adequate?*
 Assets Covered **KPUD**
 Result Notes **Roy Rogers performed valve operation on valves HA-14551 and HA-14549, operation was adequate.**

Roy's OQ expiration for valves is 8/11/2023

MO.GOODOR: Gas Pipeline Odorization

111. Question Result, ID, References **Sat, MO.GOODOR.ODORIZE.R, 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))**
 Question Text *Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?*
 Assets Covered **KPUD**
 Result Notes **The KPUD incoming line from Williams is odorized from KPUD's odorizer, the outgoing line is non-odorized.**

Reviewed KPUD form F-22 Heath Odorant Measurements, 2018-2022. Monthly tests that were done were within the required odorant limits. Also, calibration was up to date.
112. Question Result, ID, References **NA, MO.GOODOR.ODORIZE.O, 192.625(f)**
 Question Text *Is sampling of combustible gases adequate using an instrument capable of determining the percentage of gas in air at which it becomes readily detectable?*
 Assets Covered **KPUD**
 Result Notes **No such activity/condition was observed during the inspection.**

MO.GO: Gas Pipeline Operations

113. Question Result, ID, References **NA, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c))** (also presented in: MO.GOCLASS)
 Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Reviewed the KPUD Continuing Surveillance Summary documentation for 2018-2021

114. Question Result, ID, **NA, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c))** (also References presented in: MO.GOCLASS)
 Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*
 Assets Covered **KPUD**
 Result Notes **No such activity/condition was observed during the inspection.**
115. Question Result, ID, **Sat, MO.GO.OMANNUALREVIEW.R, 192.605(a)**
 References
 Question Text *Has the operator conducted annual reviews of the written procedures or processes in the manual as required?*
 Assets Covered **KPUD**
 Result Notes **Reviewed KPUD O&M revision log, annual reviews were completed as required, 2019-2021. Section 12 was added in 12/2021 for MCA's (medium consequence area).**
116. Question Result, ID, **Sat, MO.GO.OMEFFECTREVIEW.R, 192.605(a) (192.605(b)(8))**
 References
 Question Text *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*
 Assets Covered **KPUD**
 Result Notes **Reviewed OQ effectiveness forms, no issues.**
117. Question Result, ID, **Sat, MO.GO.OMHISTORY.R, 192.605(a) (192.605(b)(3))**
 References
 Question Text *Are construction records, maps, and operating history available to appropriate operating personnel?*
 Assets Covered **KPUD**
 Result Notes **Construction records, maps, and operating history are available to appropriate operating personnel via KPUDs intranet site. No issues.**
118. Question Result, ID, **Sat, MO.GO.OMHISTORY.O, 192.605(b)(3)**
 References
 Question Text *Are construction records, maps and operating history available to appropriate operating personnel?*
 Assets Covered **KPUD**
119. Question Result, ID, **Sat, MO.GO.OMLOCATION.O, 192.605(a)**
 References
 Question Text *Are appropriate parts of the manual kept at locations where operations and maintenance activities are conducted?*
 Assets Covered **KPUD**
120. Question Result, ID, **NA, MO.GO.UPRATE.R, 192.553(b) (192.553(a), 192.553(c), 192.553(d))**
 References
 Question Text *Do records indicate the pressure uprating process was implemented per the requirements of 192.553?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

MO.GMOPP: Gas Pipeline Overpressure Protection

121. Question Result, ID, **NA, MO.GMOPP.PRESSREGCAP.R, 192.709(c) (192.743(a), 192.743(b), 192.743(c))**
 References
 Question Text *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

No overpressure protection
122. Question Result, ID, **Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c))** (also References presented in: MO.GM)
 Question Text *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

Assets Covered KPUD

Result Notes Reviewed KPUD form F-17 Pipeline Patrol Report, 2019-2021, no issues. No repairs have been done on the pipe since installation in 2018

123. Question Result, ID, References NA, MO.GMOPP.PRESSREGTEST.R, 192.709(c) (192.739(a), 192.739(b))

Question Text *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

124. Question Result, ID, References NA, MO.GMOPP.PRESSREGTEST.O, 192.739(a) (192.739(b), 192.743)

Question Text *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

125. Question Result, ID, References Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: PD.RW)

Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*

Assets Covered KPUD

Result Notes Reviewed KPUD form F-17 for patrolling, all were done within the required time frame, 2019-2021. No issues

126. Question Result, ID, References Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: PD.RW)

Question Text *Are line markers placed and maintained as required?*

Assets Covered KPUD

Result Notes Adequate marker placement

127. Question Result, ID, References Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: PD.RW)

Question Text *Are the ROW conditions acceptable for the type of patrolling used?*

Assets Covered KPUD

128. Question Result, ID, References Sat, MO.RW.MARKERSURVEY.R,

Question Text *Do records indicate that pipeline marker surveys were completed in the timeframe specified by WAC 480-93-124?*

Assets Covered KPUD

Result Notes Reviewed KPUD Line Marker Survey form, surveys were completed within the required time interval

129. Question Result, ID, References Sat, MO.RW.LEAKAGE.R, 192.709(c) (192.706, 192.706(a), 192.706(b), 192.935(d))

Question Text *Do records indicate leakage surveys conducted as required?*

Assets Covered KPUD

Result Notes Reviewed KPUD form F-17 Pipeline Patrol Report. Surveys were conducted as required, 2019-2021. No issues.

130. Question Result, ID, References NA, MO.RW.CASINGLEAKSURVEY.R,

Question Text *Do records indicate shorted casings were leak surveyed as required?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

131. Question Result, ID, References NA, MO.RW.SPECIALLEAKSURVEY.R,

Question Text *Do records indicate that special leak surveys have been conducted as required by WAC 480-93-188?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

KPUD O&M section 6.1

132. Question Result, ID, References NA, MO.RW.LEAKGRADE.R,

Question Text *Do records indicate that the operator has graded leaks and determined the extent of each leak?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

KPUD O&M section 3.7

133. Question Result, ID, References NA, MO.RW.LEAKFOLLOWUP.R,

Question Text *Do records indicate that a follow-up inspection was performed not more than thirty days following a repair where residual gas remained in the ground?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

KPUD O&M section 3.7(a)

134. Question Result, ID, References NA, MO.RW.DOWNGRADELEAKREPAIR.R,

Question Text *Do records indicate that leaks that have been downgraded are repaired within twenty-one months?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

135. Question Result, ID, References NA, MO.RW.LEAKREPAIRTIME.R,

Question Text *Do records indicate that leaks were repaired and re-evaluated within the timeframes specified in WAC 480-93-18601?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

136. Question Result, ID, References Sat, MO.RW.LEAKRECORDS.R,

Question Text *Have gas leak records been prepared and maintained as required?*

Assets Covered KPUD

Result Notes KPUD form F-17 Pipeline Patrol Report records are prepared and maintained as required.

137. Question Result, ID, References Sat, MO.RW.LEAKCALIBRATE.R,

Question Text *Do records indicate that gas detection equipment has been maintained and calibrated in accordance with the manufacturer's recommendations?*

Assets Covered KPUD

Result Notes Heath DP III is used for all leak surveys, calibration equipment has been maintained and calibrated in accordance with the manufacturer's recommendations.

PD.DP: Damage Prevention

138. Question Result, ID, References NA, PD.DP.ONECALL.O, 192.614(c)(3)

Question Text *Observe operator process a "One Call" ticket.*

Assets Covered KPUD

Result Notes No such activity/condition was observed during the inspection.

139. Question Result, ID, References Sat, PD.DP.PDPROGRAM.R, 192.614(c)

Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*

Assets Covered KPUD

Result Notes KPUD PAP section 2.4 and O&M 5.4.

140. Question Result, ID, References **Sat, PD.DP.DPINFOGATHER.R, 192.947(b) (192.917(b), 192.935(b)(1)(ii))**
Question Text *Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?*
Assets Covered **KPUD**
Result Notes **Records demonstrated that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and markers. No issues**
141. Question Result, ID, References **Sat, PD.DP.NOTICETOEXCAVATOR.R,**
Question Text *Do records indicate that the operator provides the required information to excavators who damage pipeline facilities?*
Assets Covered **KPUD**
Result Notes **KPUD PAP section 6.4. No damage has occurred to the pipeline since installation.**
142. Question Result, ID, References **NA, PD.DP.COMMISSIONREPORT.R,**
Question Text *Do records indicate the operator reports to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?*
Assets Covered **KPUD**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

KPUD O&M section 9.2.1

PD.PA: Public Awareness

143. Question Result, ID, References **Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)** (also presented in: EP.ERG)
Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*
Assets Covered **KPUD**
Result Notes **KPUD EPM section 6**

Reviewed First Responder Liaison Efforts form F-36 from 2019-2021
144. Question Result, ID, References **Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)**
Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*
Assets Covered **KPUD**
Result Notes **The prevalent language in the area is English. Reviewed KPUD Pipeline Safety Communication notice that is sent out to affected public. There are not affected municipalities, school districts, or businesses near the pipeline. Communication is primarily email with local police and fire in the county.**

PD.RW: ROW Markers, Patrols, Monitoring

145. Question Result, ID, References **Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c))** (also presented in: MO.RW)
Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*
Assets Covered **KPUD**
Result Notes **Reviewed KPUD form F-17 for patrolling, all were done within the required time frame, 2019-2021. No issues**
146. Question Result, ID, References **Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d))** (also presented in: MO.RW)
Question Text *Are line markers placed and maintained as required?*
Assets Covered **KPUD**

Result Notes Adequate marker placement

147. Question Result, ID, References Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: MO.RW)

Question Text *Are the ROW conditions acceptable for the type of patrolling used?*

Assets Covered KPUD

PD.SP: Special Permits

148. Question Result, ID, References NA, PD.SP.REPAIR.R, 190.341(d)(2)

Question Text *If the operator operates a pipeline under a special permit, do records indicate that required repairs were performed?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

RPT.NR: Notices and Reporting

149. Question Result, ID, References Sat, RPT.NR.CONTACTUPDATE.R,

Question Text *Do records indicate that the operator submits updated name, address, and phone numbers of emergency contacts/responsible officials to the commission and appropriate officials of ALL municipalities in which the company has pipeline facilities?*

Assets Covered KPUD

Result Notes Reviewed emails sent to the WUTC Pipeline Program program inbox, the only change was Doug Senn being replaced with Daniel Bartholomew

KPUD O&M section 9.2.5

150. Question Result, ID, References NA, RPT.NR.CONSTRUCTIONREPORT.R,

Question Text *Do records indicate the operator has filed a proposed construction report for construction or replacement of any segment of gas transmission pipeline of at least 100 feet in length?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

KPUD O&M section 9.2.6

151. Question Result, ID, References NA, RPT.NR.PRESSURETESTNOTIFY.R,

Question Text *Do records indicate that the operator notified the commission 3 days prior to commencement of any pressure test of a gas pipeline that will have a MAOP that produces a hoop stress of twenty percent or more of the specified minimum yield strength?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

No pressure tests have been done since the installation of this pipeline, reviewed the initial hydrotest records. No issues.

152. Question Result, ID, References NA, RPT.NR.PROXIMITYREQUEST.R,

Question Text *Do records demonstrate that the operator is in compliance with the proximity consideration requirements in WAC 480-93-020?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

No new construction since installation.

RPT.RR: Regulatory Reporting (Traditional)

153. Question Result, ID, References **Concern, RPT.RR.ANNUALREPORT.R, 191.17(a)**
 Question Text *Have complete and accurate Annual Reports utilizing the most recent form F 7 100.2-1 been submitted?*
 Assets Covered **KPUD**
 Result Issue Summary **Submittal date for CY 2021 was 3/30/22, due date is March 15.**
 Result Notes **KPUD annual reports were submitted, 3/12/19 for CY 2018, 3/12/20 for CY 2019, 3/12/21 for CY 2020, 3/30/22 for CY 2021. Annual reports were accurate and complete.**
154. Question Result, ID, References **Concern, RPT.RR.CONSTRUCTIONDEFECTS.R,**
 Question Text *Do records indicate that the operator has submitted timely and complete reports of construction defects and material failures that resulted in leaks?*
 Assets Covered **KPUD**
 Result Issue Summary **KPUD could not provide a record of the construction defects and material failures that resulted in leaks for 2019**
 Result Notes **Reviewed KPUD Construction Defects and Material Failures Report for 2020, 2021, and 2022.**
155. Question Result, ID, References **NA, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a))**
 Question Text *Do records indicate immediate notifications of incidents were made in accordance with 191.5?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
156. Question Result, ID, References **NA, RPT.RR.INCIDENTREPORT.R, 191.15(a) (192.624(a)(1), 192.624(a)(2))**
 Question Text *Do records indicate reportable incidents were identified and reports were submitted to DOT on the most recent Form within the required timeframe?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
157. Question Result, ID, References **NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.15(d)**
 Question Text *Do records indicate accurate supplemental incident reports were filed and within the required timeframe using the most recent Form?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
158. Question Result, ID, References **NA, RPT.RR.FAILUREANALYSIS.R,**
 Question Text *Do records indicate that the operator submits failure analysis reports within 5 days of completion for incidents or hazardous conditions due to construction defects or material failures?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
159. Question Result, ID, References **NA, RPT.RR.SRCR.R, 191.23(a) (191.23(b), 191.25(a), 191.25(b), 191.25(c))**
 Question Text *Do records indicate safety-related condition reports were filed as required?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
160. Question Result, ID, References **Concern, RPT.RR.NPMSANNUAL.R, 191.29(a) (191.29(b))**
 Question Text *Do records indicate NPMS submissions were completed each year, on or before March 15, representing all in service, idle and retired assets as of December 31 of the previous year (excludes distribution lines and gathering lines) occurred, and that if no modifications occurred, an email was submitted stating that fact?*
 Assets Covered **KPUD**
 Result Issue Summary **KPUD could produce NPMS submission records for 12/21/2019, CY 2018, 11/26/2021, CY 2020, 3/20/2022, CY 2021. A submission for 2019 was missed. Also, the reports were not sent in by March 15 for any of the provided records.**
 Result Notes **NPMS submissions were 12/21/2019, 11/26/2021, 3/20/22**

161. Question Result, ID, References **Sat, RPT.RR.PIPELINEMAPPING.R,**
 Question Text *Do records indicate that accurate maps (or updates) are provided for pipelines operating over 250 PSIG to specifications developed by the commission and sufficient to meet the needs of first responders?*
 Assets Covered **KPUD**
 Result Notes **KPUD submitted the shapefile 2/24/2020, there have been no changes since.**
162. Question Result, ID, References **Sat, RPT.RR.OPID.R, 191.22(a) (191.22(c), 191.22(d))**
 Question Text *Do records indicate appropriate obtaining, and control of, Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*
 Assets Covered **KPUD**
 Result Notes **KPUD pipeline OPID is 39809, no changes have occurred since the installation of the pipeline**
163. Question Result, ID, References **NA, RPT.RR.DIRTREPORTS.R,**
 Question Text *Do records indicate that the operator has submitted reports of damage to the commission using the damage information reporting tool (DIRT) within 45 days?*
 Assets Covered **KPUD**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

KPUD participates in DIRT, no damages have occurred since the installation of the pipe

TD.ATM: Atmospheric Corrosion

164. Question Result, ID, References **Sat, TD.ATM.ATMCORRODE.R, 192.491(c) (192.479(a), 192.479(b), 192.479(c))**
 Question Text *Do records document the protection of above ground pipe from atmospheric corrosion?*
 Assets Covered **KPUD**
 Result Notes **KPUD procedure P-31.**

Reviewed KPUD form F-3 from 7/27/18, 6/30/21.

The only two atmospheric area's are at the Williams Gate station and the KPUD plant end. No issues.
165. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c))**
 Question Text *Do records document inspection of aboveground pipe for atmospheric corrosion?*
 Assets Covered **KPUD**
 Result Notes **KPUD procedure P-31.**

Reviewed KPUD form F-3 from 7/27/18, 6/30/21.

The only two atmospheric area's are at the Williams Gate station and the KPUD plant end. No issues.
166. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))**
 Question Text *Is pipe that is exposed to atmospheric corrosion protected?*
 Assets Covered **KPUD**
 Result Notes **Surface-air-interface was adequate at the RNG facility and the Williams gate/KPUD DF**

TD.CPMONITOR: External Corrosion - CP Monitoring

167. Question Result, ID, References **NA, TD.CPMONITOR.CURRENTTEST.R, 192.491(c) (192.465(b))**
 Question Text *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?*
 Assets Covered **KPUD**

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

KPUD pipeline uses galvanic linear magnesium anodes.

168. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(a))
Question Text *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?*
Assets Covered KPUD
Result Notes CP TS #1 -1272mV CSE on, -1083mV CSE off

CP TS #9 -1724mV CSE on, -1105mV CSE off

CP TS #11 -1858mV CSE on, -1090mV CSE off

Multimeter calibration expiration 12/2023, half-cell calibration expiration 7/2022

Roy rogers performed all CP checks, OQ expiration 8/11/2023
169. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.R, 192.491(c) (192.463(a))
Question Text *Do records document that the CP monitoring criteria used was acceptable?*
Assets Covered KPUD
Result Notes KPUD uses -850mV and 100mV shift criteria. O&M section 4.4.1 (c)(d). Coupons and CuCuSO4 are equipped at each test station. Records verified this.
170. Question Result, ID, References Sat, TD.CPMONITOR.TEST.R, 192.491(c) (192.465(a))
Question Text *Do records adequately document cathodic protection monitoring tests have occurred as required?*
Assets Covered KPUD
Result Notes Reviewed CP monitoring form F-7 from 2019-2021. CP checks are done bi-yearly.
171. Question Result, ID, References NA, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)
Question Text *Are impressed current sources properly maintained and are they functioning properly?*
Assets Covered KPUD
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
172. Question Result, ID, References NA, TD.CPMONITOR.REVCURRENTTEST.R, 192.491(c) (192.465(c))
Question Text *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?*
Assets Covered KPUD
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
173. Question Result, ID, References NA, TD.CPMONITOR.REVCURRENTTEST.O, 192.465(c)
Question Text *Are interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?*
Assets Covered KPUD
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
174. Question Result, ID, References NA, TD.CPMONITOR.DEFICIENCY.R, 192.491(c) (192.465(d))
Question Text *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?*
Assets Covered KPUD
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
175. Question Result, ID, References Sat, TD.CPMONITOR.TESTSTATION.R, 192.469
Question Text *Do records identify the location of test stations and show a sufficient number of test stations?*

Assets Covered KPUD

Result Notes There are 11 test stations, approximately 1200ft apart, verified via areal map.

176. Question Result, ID, References Sat, TD.CP.MONITOR.TESTLEAD.R, 192.491(c) (192.471(a), 192.471(b), 192.471(c))

Question Text Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?

Assets Covered KPUD

Result Notes Test leads are installed in accordance with requirements of Subpart I

177. Question Result, ID, References NA, TD.CP.MONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a))

Question Text Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?

Assets Covered KPUD

Result Notes The only source of interference currents is the Williams pipeline at the gate station. Low level influence can be observed during Cathodic Protection Testing.

178. Question Result, ID, References Sat, TD.CP.RECORDS.R, 192.491(a) (also presented in: TD.CP, TD.CPEXPOSED)

Question Text Do records indicate the location of all items listed in 192.491(a)?

Assets Covered KPUD

Result Notes Records indicated the location of all items listed in 192.491(a)

TD.CP: External Corrosion - Cathodic Protection

179. Question Result, ID, References Sat, TD.CP.POST1971.R, 192.491(c) (192.455(a), 192.457(a), 192.452(a), 192.452(b))

Question Text Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?

Assets Covered KPUD

Result Notes KPUD pipeline was installed in 2018. Cathodic protection was installed while the pipeline was installed using linear magnesium anode ribbon.

180. Question Result, ID, References NA, TD.CP.PRE1971.O, 192.457(b)

Question Text Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I or Part 192?

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

181. Question Result, ID, References NA, TD.CP.UNPROTECT.R, 192.491(c) (192.465(e))

Question Text Do records adequately document the re-evaluation of non-cathodically protected buried pipelines for areas of active corrosion?

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

182. Question Result, ID, References Sat, TD.CP.ELECISOLATE.R, 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))

Question Text Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?

Assets Covered KPUD

Result Notes 4 isolation areas that are monitored

183. Question Result, ID, References Sat, TD.CP.ELECISOLATE.O, 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))

Question Text *Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered KPUD

Result Notes KPUD pipe and Williams NWP are isolated

184. Question Result, ID, References NA, TD.CP.CASINGINSPECT.R,

Question Text *Do records indicate that annual casing inspections have been performed to ensure electrical isolation from the pipeline?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

185. Question Result, ID, References NA, TD.CP.CASINGINSPECT.O,

Question Text *Are casings electrically isolated from the pipeline?*

Assets Covered KPUD

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

186. Question Result, ID, References Sat, TD.CP.RECORDS.R, 192.491(a) (also presented in: TD.CPMONITOR, TD.CPEXPOSED)

Question Text *Do records indicate the location of all items listed in 192.491(a)?*

Assets Covered KPUD

Result Notes Records indicated the location of all items listed in 192.491(a)

TD.COAT: External Corrosion - Coatings

187. Question Result, ID, References Sat, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a))

Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?*

Assets Covered KPUD

Result Notes KPUD pipeline is coated with FBE, ARO and powercrete. The section with FBE, ARO, and powercrete is at the bored section under the roadway. Verified via pipeline summary documentation.

TD.CPEXPOSED: External Corrosion - Exposed Pipe

188. Question Result, ID, References NA, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459)

Question Text *Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

189. Question Result, ID, References NA, TD.CPEXPOSED.EXPOSEINSPECT.O, 192.459

Question Text *Is exposed buried piping examined for corrosion and deteriorated coating?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

190. Question Result, ID, References NA, TD.CPEXPOSED.EXTCORRODREPAIR.R, 192.491(c) (192.485(a), 192.485(b), 192.485(c))

Question Text *Do records document the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

191. Question Result, ID, References Sat, TD.CP.RECORDS.R, 192.491(a) (also presented in: TD.CPMONITOR, TD.CP)

Question Text *Do records indicate the location of all items listed in 192.491(a)?*

Assets Covered KPUD

Result Notes Records indicated the location of all items listed in 192.491(a)

TD.ICP: Internal Corrosion - Preventive Measures

192. Question Result, ID, References NA, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b))

Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

193. Question Result, ID, References NA, TD.ICP.EXAMINE.O, 192.475(a) (192.475(b))

Question Text *Is removed pipe examined for evidence of internal corrosion?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

194. Question Result, ID, References NA, TD.ICP.EVALUATE.R, 192.491(c) (192.485(c))

Question Text *Do records document adequate evaluation of internally corroded pipe?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

195. Question Result, ID, References NA, TD.ICP.REPAIR.R, 192.485(a) (192.485(b))

Question Text *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

TQ.PROT9: OQ Protocol 9

196. Question Result, ID, References NA, TQ.PROT9.CORRECTION.O, 192.801(a) (192.809(a))

Question Text *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

197. Question Result, ID, References Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a))

Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's processes or operator approved contractor processes.*

Assets Covered KPUD

198. Question Result, ID, References Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801(a) (192.809(a))

Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*

Assets Covered KPUD

Result Notes Roy Rogers performed all covered tasks on the pipeline.

OQ expiration: 8/11/2023 pipe-to-soils and valve operation

These were the only tasks observed

199. Question Result, ID, References Sat, TQ.PROT9.AOCRECOG.O, 192.801(a) (192.809(a))

Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*

Assets Covered KPUD

Result Notes Roy was cognizant of AOCs applicable to work performed

200. Question Result, ID, References NA, TQ.PROT9.VERIFYQUAL.O, 192.801(a) (192.809(a))

Question Text *Observe in the field (job site, local office, etc.) that the foreman/supervisor/manager has verified the qualification of the individual performing the task, that the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

TQ.OQ: Operator Qualification

201. Question Result, ID, References Sat, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))

Question Text *Are adequate records containing the required elements maintained for contractor personnel?*

Assets Covered KPUD

Result Notes Roy Rogers is the only contracted individual that performs OQ covered tasks on the pipeline. Roy's OQ's were adequate, expiration 8/2023

202. Question Result, ID, References Sat, TQ.OQ.RECORDS.R, 192.807

Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*

Assets Covered KPUD

Result Notes There are 8 KPUD employees that perform covered tasks on the pipeline. All individuals OQ's are adequate and up to date. Reviewed task lists.

203. Question Result, ID, References Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b))

Question Text *Does the operator have records for initial qualification, re-training and re-evaluation of individuals performing covered tasks?*

Assets Covered KPUD

Result Notes All individuals OQ's are adequate and up to date

204. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.R, 192.807(a) (192.807(b), 192.803)

Question Text *Do records document evaluation of qualified individuals for recognition and reaction to AOCs?*

Assets Covered KPUD

Result Notes Records documented evaluation of qualified individuals for recognition and reaction to AOCs

TQ.QU: Qualification of Personnel - Specific Requirements

205. Question Result, ID, References Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))

Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*

Assets Covered KPUD

Result Notes Roy Rogers is the only individual that performs CP checks on the pipeline, his OQ's are accurate and up to date.

TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

206. Question Result, ID, References NA, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))

Question Text *Do records indicate the qualification of nondestructive testing personnel?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Reviewed KPUD pipeline NDT records for pipeline installation in 2018, no NDT has occurred since then.

207. Question Result, ID, NA, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c),
References 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))

Question Text *Do records indicate that welders are adequately qualified?*

Assets Covered KPUD

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Reviewed welder qualifications for when the pipe was installed in 2018. No welding has been performed since.

TQ.TR: Training of Personnel

208. Question Result, ID, Concern, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b))
References

Question Text *Is training for emergency response personnel documented?*

Assets Covered KPUD

Result Issue Summary KPUD had a procedure, but could not provide a record showing the training had been done. KPUD staff mentioned that the training did occur, but could not provide an attendance sheet of the employees present.

Result Notes KPUD had a Procedure, could not provide a record showing the training had been done.

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.